

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(B)**

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Attorneys for the Chapter 7 Trustee

In Re:  
Kline Construction Co., Inc.,  
Debtor.

Case No.: 19-25757

Judge: Jerrold N. Poslusny Jr.

Chapter: 7

**AMENDED**  
**CERTIFICATION OF PROFESSIONAL IN SUPPORT OF**  
**APPLICATION FOR RETENTION OF PROFESSIONAL**

I, Stan Mastil, CPA, CFF, being of full age, certify as follows:

1. I am seeking authorization to be retained as Accountant for the Trustee.
2. My professional credentials include: 22 years experience in bankruptcy cases.  
\_\_\_\_\_  
\_\_\_\_\_
3. I am a member of or associated with the firm of: Gavin/Solmonese LLC  
919 Market St., Suite 600, Wilmington, DE 19801.
4. The proposed arrangement for compensation, including hourly rates, if applicable, is as follows My hourly rate is \$500.00 per hour. The rates for other professionals of the firm range from \$250.00 to \$700.00 per hour, and the rate for paraprofessionals is \$200.00 per hour.

☐ Pursuant to D.N.J. LBR 2014-3, I request a waiver of the requirements of D.N.J. LBR 2016-1.

5. To the best of my knowledge, after reasonable and diligent investigation, my connection with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe connection: My firm was previously retained and appointed in this case under Chapter 11 as the accountants for the Official Committee of Unsecured Creditors. The Appointment Order was vacated and replaced by an

Order appointing my firm as the Financial Advisor for Debtor. See Docket #143.  
6. To the best of my knowledge, after reasonable and diligent investigation, the connection of my firm, its members, shareholders, partners, associates, officers and/or employees with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe Connection: My firm was previously retained and appointed in this case under Chapter 11 as the Financial Advisors for the Debtor by Order dated October 8, 2019. See Docket #143.

7. To the best of my knowledge, my firm, its members, shareholders, partners, associates, officers and/or employees and I (check all that apply):

☒ do not hold an adverse interest to the estate.

☒ do not represent an adverse interest to the estate.

☒ are disinterested under 11 U.S.C. § 101(14).

☒ do not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which I will be retained under 11 U.S.C. § 327(e).

☒ Other. Explain: Gavin/Salmonese LLC was appointed as financial advisor for debtor in the Chapter 11 case and holds an administrative claim.

8. **Pre-Conversion Claims**

Gavin/Solmonese LLC agrees to waive all pre-conversion claims other than the sum of \$25,000.00 to be paid pursuant to the Consent Order giving \$25,000 to Gavin Solmonese on account of the Professionals Carve-out as provided for in, but not yet paid under, the Fifth Interim Cash Collateral Order.

b. The proposed method of calculation of my compensation, including rates and formulas, is: \_\_\_\_\_

Pursuant to D.N.J. 2014-2, I ☐ do or ☐ do not request a waiver of the requirements of D. N. J. LBR 2016-1.

c. The following is an estimate of all costs and expenses, including labor, security, advertising, delivery, mailing, and insurance, for which I will seek reimbursement from the sale proceeds: \_\_\_\_\_

d. Have you, or a principal of your firm, been convicted of a criminal offense?

☐ No


☐ Yes (explain below)

e. I certify that a surety bond as described in D. N. J. LBR 2014-2(a)(6) is in effect and will remain so through the date of turnover of the auction proceeds.

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: \_\_\_\_\_

I certify under penalty of perjury that the above information is true.

Date: January 27, 2020

  
Signature of Professional

rev.8/1/15